



**Georgia Department of Education  
Office of the State Superintendent of Schools  
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State Superintendent of Schools**

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<http://www.doe.k12.ga.us/nutrition/snp.html>  
April 28, 2000**

FD2000 Project Coordinator  
Food Distribution Division - FNS  
3101 Park Center Drive  
Ford Avenue Bldg. - Room 601  
Alexandria, Virginia 22302

Dear Project Coordinator:

As Area Consultant for the Northwest part of Georgia, I wish to submit my comments on the February 14, 2000, USDA Proposal for Change.

Although there was a lack of specific information in the proposal document on which to make a thorough determination of the effects on the local school systems with which I work, the following information is provided:

Test best value contracting, move toward national umbrella contracts with processors (based on implementation), facilitate the processing of commodities with limited demand, develop written hold and recall procedures, reduce the duration of product holds at the school level, publish commodity recall reimbursement procedures, and relaxing truckload requirements all appear to be good concepts and could easily be applied to the current Food Distribution Program for immediate improvement. However, I am totally opposed to allowing vendors to use commercial labels and to expanding full substitutability of commodity product. These two concepts would create nightmares for warehouses and schools in tracking and accounting for USDA foods and would lend themselves toward more food safety problems.

I am also concerned about the pilots that are currently underway or will shortly be put into place. I am unable to locate on USDA's website any information regarding baseline information/data, objectives, and evaluation methods. Also, have any control states for the current Food Distribution Program been identified?

I would also like to see comments such as this one tabulated by the 16 proposed changes and available for public review. Thank you for your consideration of these comments.

Sincerely,

**Melissa Lyon Mabry, Area Consultant  
Georgia Department of Education  
School Nutrition Program**

MLM/jds

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